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June 27, 2019

BY ECF

Hon. Pamela K. Chen
United States District Court
225 Camden Plaza East
Brooklyn, NY 11201

Re: Protostorm, Inc. v. Mound Cotton Wollan & Greenglass, LLP, et al.
Docket No.: 1:18 CV 02107 (PKC)(JO)
Our File No.: 1712.01

Dear Judge Chen:

Our office represents plaintiff, Protostorm, Inc. in the above-referenced action. Pursuant to your June 19, 2019 Docket Order, we are writing to inform the Court of the status of the settlement between Protostorm, Inc. and all of the defendants **except** for defendants Foley & Lardner LLP and Jonathan E. Moskin. Plaintiff and the settling defendants have not finalized the settlement agreement as of this date but anticipate that the agreement will be finalized by July 12th. The settling parties again request that the Court defer on issuing a ruling on the defendants' motion to dismiss pursuant to Fed. R. Civ. P. Rule 12(b)(1) until after plaintiff and the settling defendants have executed the settlement agreement.

Respectfully submitted,

John Ponterio

John Ponterio

cc: Barry Felder, Esq., Foley & Lardner LLP (via ECF)
Stephen Jacobs, Esq., Landman Corsi Ballaine & Ford P.C. (via ECF)
Robert J. Bergson, Esq., Abrams Garfinkel Margolis Bergson, LLP (via ECF)